

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

WILLIE ABNER, et al.,	)
	)
Plaintiffs,	)
	)
v.	) Civil Action File No. 2:15-CV-2040-
	) KOB
UNITED STATES PIPE AND	)
FOUNDRY COMPANY, LLC, and	) This Document Relates to All Cases
MUELLER WATER PRODUCTS, INC.	)
	)
Defendants.	)

---

**JOINT MOTION TO CONTINUE**

Plaintiffs (in this, and all related cases before this Court) and Defendants United States Pipe & Foundry Company, LLC and Mueller Water Products, Inc. (collectively “Defendants”) hereby jointly move this Court to continue the Court’s requirement that a status report on the Parties’ settlement discussions be submitted by today, April 3, 2018, until Friday, April 6, 2018, and to further stay all proceedings in these consolidated cases until April 6, 2018 so that the Parties may continue to engage in good-faith discussions to resolve these actions. In support of this motion, the Parties state as follows:

1. On March 13, 2018, the Parties filed a Joint Motion to Stay (Doc. 149), requesting that this Court stay all deadlines for two weeks to allow time for the Parties to engage in good-faith settlement discussions.

2. On March 14, 2018, this Court granted the Parties' Motion and further ordered that a status report be submitted by April 3, 2018, updating this Court on the status of the settlement discussions.

3. The Parties have consulted and agree that additional time is needed for the continuation of the meaningful settlement discussions that are already underway. The Parties believe that a continuation until April 6, 2018 will allow sufficient time to conclude the ongoing discussions.

For the foregoing reasons, the Parties respectfully ask this Court to grant this motion and to continue the current deadline to file a status report and further stay all proceedings in these consolidated cases until April 6, 2018. For the Court's convenience, a proposed order is attached (Exhibit A).

Respectfully submitted this 3rd day of April, 2018

/s/ Jon C. Conlin

Jon C. Conlin (asb-7024-j66c)  
R. Andrew Jones (asb-0096-i11r)  
Mitchell Theodore (asb-6549-i00d)  
Joel Caldwell (asb-4625-z36e)  
**Attorneys for Plaintiffs**

CORY WATSON, P.C.  
2131 Magnolia Avenue, Suite 200  
Birmingham, AL 35205  
[jconlin@corywatson.com](mailto:jconlin@corywatson.com)  
[ajones@corywatson.com](mailto:ajones@corywatson.com)  
[mtheodore@corywatson.com](mailto:mtheodore@corywatson.com)  
[jcaldwell@corywatson.com](mailto:jcaldwell@corywatson.com)

/s/ Sharon D. Stuart

Sharon D. Stuart (asb-8559-r59s)  
Michael A. Vercher  
(asb-4976-h32m)  
**Attorneys for Defendants**  
OF COUNSEL  
CHRISTIAN & SMALL LLP  
505 North 20<sup>th</sup> Street, Suite 1800  
Birmingham, AL 35203  
205-795-6588  
[sdstuart@csattorneys.com](mailto:sdstuart@csattorneys.com)  
[mavercher@csattorneys.com](mailto:mavercher@csattorneys.com)

/s/ Elizabeth H. Huntley

Elizabeth H. Huntley  
(asb-1243-e55e)  
**Attorney for Defendants**

OF COUNSEL  
LIGHTFOOT, FRANKLIN &  
WHITE LLC  
The Clark Building  
400 20th Street North  
Birmingham, AL 35203  
205-581-0700  
[ehuntley@lightfootlaw.com](mailto:ehuntley@lightfootlaw.com)

/s/ Meaghan G. Boyd

James C. Grant  
(admitted pro hac vice)  
Georgia Bar No. 305410  
Douglas S. Arnold  
(admitted pro hac vice)  
Georgia Bar No. 023208  
Meaghan G. Boyd  
(admitted pro hac vice)  
Georgia Bar No. 142521  
**Attorneys for Defendants**

ALSTON & BIRD LLP  
One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia 30309-3424  
404-881-7000  
[jim.grant@alston.com](mailto:jim.grant@alston.com)  
[doug.arnold@alston.com](mailto:doug.arnold@alston.com)  
[meaghan.boyd@alston.com](mailto:meaghan.boyd@alston.com)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

WILLIE ABNER, et al.,	)
	)
Plaintiffs,	)
	)
v.	) Civil Action File No. 2:15-CV-2040-
	) KOB
UNITED STATES PIPE AND	)
FOUNDRY COMPANY, LLC, and	) This Document Relates to All Cases
MUELLER WATER PRODUCTS, INC.	)
	)
Defendants.	)

---

**CERTIFICATE OF SERVICE**

This is to certify that I have served a copy of the within and foregoing on this the 3rd day of April, 2018, by filing same with the Court's CM/ECF system, which will send notice to counsel of record as follows:

James C. Grant  
Douglas S. Arnold  
Meaghan G. Boyd  
ALSTON & BIRD LLP  
One Atlantic Center  
1201 W. Peachtree Street  
Atlanta, Georgia 30309-3424  
[jim.grant@alston.com](mailto:jim.grant@alston.com)  
[doug.arnold@alston.com](mailto:doug.arnold@alston.com)  
[meaghan.boyd@alston.com](mailto:meaghan.boyd@alston.com)

Sharon D. Stuart  
Michael A. Vercher  
CHRISTIAN & SMALL LLP  
505 North 20<sup>th</sup> Street, Suite 1800  
Birmingham, AL 35203  
[sdstuart@csattorneys.com](mailto:sdstuart@csattorneys.com)  
[mavercher@csattorneys.com](mailto:mavercher@csattorneys.com)

Elizabeth H. Huntley  
LIGHTFOOT, FRANKLIN &  
WHITE LLC  
The Clark Building  
400 20<sup>th</sup> Street North  
Birmingham, AL 35203  
[ehuntley@lightfootlaw.com](mailto:ehuntley@lightfootlaw.com)

*/s/ Jon C. Conlin*  
\_\_\_\_\_  
CORY WATSON, P.C.